FORM OF ORDER SHEET

Court of_ 2517/2023 Appeal No. . . Order or other proceedings with signature.of judge S.No. Date of order proceedings : . 1 2 3 1-05/12/2023 The appeal of Mst. Shenaz resubmitted today by Sardar Muhammad Asif Advocate. It is fixed for preliminary. hearing before touring Single Bench at A.Abad on By the order of Chairman REGISTRAR

The appeal of Mst. Shanaz received today i.e on 20.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Check list is not attached with the appeal.

Ŷ

- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Address of appellant is incomplete which may be completed according to rule 6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Annexures of the appeal are unattested.
- 5- In each and every documents the name of the appellant be highlighted.
- 6- Copy of appointment order in respect of appellant be placed on it.
- 7- Annexure-A (Page no. 8 to 15 & 25) of the appeal are illegible which may be replaced by legible/better one.
- 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3. 3/ . /S.T, /2023: REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR. Sardar Muhammad Asif Adv. High Court A.Abad. الاسروفي فر ا تا چ هم مرد باق من Kemor اطبة دحن نشر الماس عمرولي ف Remme 2 2 (1) 3 110 Remind 5/12/2

is i be de de la pelo que de la constance de la constance de la company de la company

61,2/23

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No. 5/7/2023

Shenaz Teacher Government Girls Primary School Kunry Torghar R/o Torghar.

...APPELLANT

V/S

Director Elementary and Secondary Education & OthersRESPONDENTS

SERVICE TRIBUNAL

INDEX

Description	Page No	Annexure
Service Appeal Along with Affidavit		1-5
Copy of Appointment Order	"A"	6-8
Copy of One of Affidavit	"B"	9-10
Copy of Departmental Appeal	"C"	11-15
VakalatNama		16
	Service Appeal Along with Affidavit Copy of Appointment Order Copy of One of Affidavit Copy of Departmental Appeal	Service Appeal Along with AffidavitCopy of Appointment Order"A"Copy of One of Affidavit"B"Copy of Departmental Appeal"C"

Date (7/11/22

Through (Sardar Muhammad Asif) (Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad

 (\mathbf{F})

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No. 517/2023

Shenaz Teacher Government Girls Primary School Kunry Torghar R/o Torghar.

...APPELLANT

V/S

- 1. Director Elementary and Secondary Education KPK Directorate Peshawar.
- 2. District Education Officer (Female) Torghar.

...RESPONDENTS

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE IN-ACTION OF RESPONDENTS QUA TRANSFER OF THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA FROM DISTRICT TORGHAR DESPITE OF THE FACT THAT APPELLANT HAVE ALREADY SPENT (10 YEARS) MUCH MORE TIME THEN THE STIPULATED/PRISCRIBED PERIOD AS PER LAW AND AS PER CONTRACT SIGNED BETWEEN APPELLANT AND DEPARTMENT.

AND

NON GRANTING OF BPS-15 TO THE APPELLANT AFTER ALMOST TEN YEARS OF CONTINUES SERVICE, UNLIKE OTHER SIMILAR PLACED TEACHERS OF DISTRICT MANSHERA

AND

AGAINST NON-REDRESSAL OF GREVIANCE OF APPELLANT DISPITE OF REPEATED APPLICATION/PETITION/APPEAL FILED BY THE APPELLANT.

AND

AGAINST THE DISCRIMINATION BEING FACED BY THE APPELLANT AT THE HANDS OF AUTHORITIRS/RESPONDENTS WHEREBY SIMILARLY PLACED EMPLOYEES WERE TRANSFERRED AND APPELLANT ARE LEFT TO FACE RIGORS OF HARD AREAS.

PRAYER:

ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth:

- 1. That, the appellant is hailing from District Manshera and are highly educated, having qualification of MA, M.ED, and B.ED etc.
- That, the appellant were inducted into service on merits as PST BPS-12 in 2013 and 2015 respectively on the strength of District Manshera and were assigned duties to different schools of Torghar, which was once happened to be a provincial administrative tribal area, controlled and managed from District Manshera.(Copy of Appointment Order is attached as Annexure "A")
- 3. That, at the time of appointment, the appellant were directed by the respondents to execute affidavit, individually to the effect that they would serve at torghar continuously for three years without any demand of transfer to their native District nor they would leave the service and after completion of such stipulated period they would be transferred to their own district. The appellant submitted above said affidavit to the respondents. (Copy of One of Affidavit is Annexed as Annexure "B")
- 4. That, besides appellant, there were other teacher who belonged to District Shangla, who were transferred to their District after completion of period of three years as were mentioned in affidavit, and few of them transferred to District Manshera recently.
- 5. That, since appointment, the appellant were serving at District Torghar, and on completion of agreed period of three years, the appellant moved many application to different forums for their transferred as per law, to their own District but in vain. (Copy of Departmental Appeal is Attached as Annexure "C")
- 6. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
- 7. That, the appellant filled a complained/appeal to the respondents for the redressal of their grievance which has not been decided up till now, hence instant appeal.

Feeling aggrieved from above mentioned in-actions and discriminations of respondents, the appellant have come to this honorable Court on the following inter-alia amongst many other grounds:

GROUNDS:

- 1. That, the in-action of non-transferring of appellant to their own District even after spending much more time than stipulated period of three year is illegal, unlawful, perverse, unilateral and against the settled principle of natural justice and fair play.
- 2. That, as per government policy regarding hard areas, the civil servant must be transferred after one year maximum.
- 3. That, a lot of similarly placed teachers had already been transferred to their District more particularly District Shangla. Non-transferring of appellant is nothing but to corner the appellant and the appellant is simply victimized of discrimination by the respondents.
- That, the appellant is female and have to travel for 3 to 4 hours continuously to reach at their destination with fare of almost Rs. 4,000/- per trip, even then the grievance of appellant are not being redressed.
- 5. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
- 6. That, despite of the continues application/ appeal/ petition/complaint the appellant are still waiting for justice, but a duff ear turn towards them.
- 7. That, even the transferred policy of the government is put in abeyance by the respondents and the appellant is constrained to serve at the place for along eleven years, which is otherwise hard one.
- 8. That, other point would be raised at the time of arguments.
- 9. That, the appeal in hand is well within time.
- 10. That, the honorable court has exclusive jurisdiction to adjudicate and proper court fee has been annexed.

11. That, notices of appeal in hand has also been issued to respondents.

PRAYER:-

IT IS THEREFORE, HUMBLY PRAYED THAT ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Through

6

(4

APPELLANT

Date 17/11/22

(Sardar Muhammad Asif) & We (Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad

VERIFICATION:-

Verification on oath that contents of the foregoing appeal are true and correct to best of my knowledge and belief and nothing concealed from this honorable tribunal.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No. /2023

Shenaz R/o Teacher Government Girls Primary School Kunry Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others

...RESPONDENTS

AFFIDAVIT

I, Shenaz R/o Teacher Government Girls Primary School Kunry Torghar, solemnly affirm and declare on oath that the contents of the titled "Instant Appeal" are true and correct to the best of my knowledge belief and nothing has been concealed from this honorable court.

DEPONENT

Date. 17/11/23 18(2)/27

OFHCE ORDER/APPOINTMENT

Consequent upon the recommendation' approval of the District selection Committee To-Ghar in its meeting held on 18/01/2013 the Competent Authority is pleased to appoint the following fresh trained hem-ic candidates on merit having the prescribed qualification in BPS 12(05.7000 - 500-22000) plus usual allowances as admissible under the rules against the vacant post of PSF (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt: on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

"Tappa Wise" Discrict Tor Ghar

•					· · · · · · · · · · · · · · · · · · ·			······································
S.No	Candidate NAME	Father's Name	Tappe	Quail:	Score	School/Station where posted	Zone	Remarks
	Sumaita Gul	Muhammad Ismaeel	Hasson - Zai	BA	42,41 -	GGPS Mareer (HZ)	Summer	Agatost V /P
2	Farzana Habib	Habib Khan	Dassikhail	BA	42.3B	GGPS Gul Dheri (BK)	Summer	Against V /P
3	Saba Gul	Shah Jahan	Mada Khai	ВΛ	42.05	GGPS Maira Mada Khail	Summer	Against V /P

"Open Merit" Adjacent Districts

S.N	Candidate Name	Father's Hame	Domicile	Qualf:	. Scere	School/Station where Posted	Zone	Remarks
1	Ayesha Humma Swati	Muhammad Shaukai Khan	Mansehra	MSc	77.80	GGP3 Palosa (HZ)	Sumpler	Against V /P
2	Adeela Shaukal Swati :	Muhammad Shaukat Khan	Mánsehrá	MSc	75.70	GGP5 Garbi (HZ)	d is Summer	Against V /P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V /P
2	Aisha Bibi	Faqt Muhammad	Mansehra	S MSC	<u>75.06</u>	3GPS Kand Bala (BK)	Summer	Agsirist V /F
5	Nosheen Kenwal	Sikandar Hayat	Mansehra	MA	65.80	17GPS Gul Dairee (BK)	Summer	Against V /F
6	Phool Bibi	Muhamad Farooq	Mansehra	MA	64.11	G 3PS Zeezari (BK)	Summer	Against V /I
- 7	Raham Bibi	Zamanat Khan	Shangla	, BSc	² 63.78	GC PS Khadang (AZ)	Summer	Against V /I
8	Safia Bibi	Syed Sullan Shah	Mansehra	MA .	63.13	GG 25 Kand Paayeen (AZ)	Winter	Against V //
9	Sadia Shoaxat	Muhammad Shoukal	Mansehra	MA	62.64	GG 'S New Killay (HZ)	Summer	Against V /
10	Bibi Saeeda tun Nisa	Oari Abdul Rashid	Mansehra	MA	61.80	GC PS Bimbal (AZ)	Summer	Against V /

ţ

1-079259 -Sohte

Office Order/Appointment

Consequent upon the recommendation approval of the district selection committee tor ghar in its meeting held on 18-01-2013 the competent authority is pleased to appoint the following fresh trained female candidates on merit having the prescribed qualification in BPS-12 (Rs.7000 500-22000) plus usual allowances as admissible under the rules against the vacant post to PST (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt on terms and condition given below with effect from the dates of their taking over charge in the interest of public service.

Tappa Wise District Tor Ghar

S.N	Candidate Name	Father Name	Тарра	Quaif	Score	School/Station where posted	Zone	Remarks
1	Sumaira Gul	Muhammad Ismaeei	Hassan Zai	BA	42.41	GGPS Mareer (HZ)	Summer	Against VIP
2	Farzena Habib	Habib Khan	Bassikhail	BA	42.38	GGPS Gul Dheri (BK)	Summer	Against V/P
3	Saba Gul	Shah jahan	Mada Khail	BA	42.05	GGPS Maira Made Khail	Summer (Against V/P

"Open Merit" Adjacent Districts

S.No	Candidate Name	Father Name	Domicilo	Quaif	Score	School/Station where posted	Zone	Remarks
1	Ayesha Humma Swati	Muhammad Shaukat Khan	Mansehra	1480	77.68	GGPS Palosa (HZ)	Summer	Against V/P
2	Adeela Shaukat Swati	Muhammad Shaukat Khan	Mansehra	MSc	76,70	GGPS Garhi (HZ)	Summer	Against V/P
3	Faize Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Gaeto (BK)	Winter	Against V/P
4	Aisha Bibi	Fagir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (BK)	Summer	Against
5	Nosheen Kanwal	Sikander Hayat	Mansehra	MA,	65.80	GGPS Gui Dairee (BK)	Summer	Against V/P
6	Phool Bibi	Muhammad Farooq	Mansehra	MA	64.1i	GGPS Zeezari (®K)	Summer	Against V/P
7	Raham Bibi	Zamanal Khan	Shangla	BSc	63.78	GGPS Khadang (AZ)	Summer	Against V/P
8	Safia Bibi	Syed Sultan Shah	Mansehra	MA	63.13	GGPS Kand Paayeen (AZ)	Winter	Against V/P
9	Sadia Shoakat	Muhammad Shoukai	Mansehra	MA	62.64	GGPS New Killay (HZ)	Summer	Against V/P
10	Bibi Saeeda tun Nisa	Qari Abdul Rashid	Mansehra	MA	61.80	GGPS Bimbal (AZ)	Summer	Against VIP
11	Sobia Bibi	Abdul Hamid	Mansehra	MA	58.74	GGPS Bimbal (AZ)	Summer	 Against V/P
12	Rabia	Aurangzeb	Mansehra	MA	58.64	GGPS Judba	Summer	Against V/P
13	<u> </u>		<u>↓</u>			/////	2	Against V/P
14	Zahiral Bibi	Rahim Shah	Shangla	850	58.00	GGPS Kander (BK)	Summer	Ageinst V/P
15	Nazia Haroon	Muhammad Haroon	Mansehra	MÀ	57.16	GGPS Gangi (HZ)	Winter	Against V/P
16	Shagulia Bibi	Hazrat Younas	Shangla	MA	55.89	GGPS Cirapa Biratoni (BK)	Winter	Against V/P
17	Tahira Bibi	Abdul Qayyum	Mansehra	BSc	53.52	GGPS Arbay Jalband (AZ)	Winter	Against V/P
18	Farheena Ali Akbar	Ali Akbar	Mansehra	MA	55.42	GGPS Murata (AZ)	Winter	Against V/P
19	Pari Had	Aniullah	<u>}</u>	MA	55,17	GGPS Khanday (BK)	Winter	AgeinsV/F

ी से	F					-	1	interfacers in Antoin Ac.		
	•			÷	•		(8)		D	
	-sid		hdol Hamida	Managiuo. Diversione		350:74267	GGESIGINIDAII(AZ)	Summer	AgaInst V /P	
1.5	_	i ja Dis	Aurang Zeb	Marriela		,+	G6t5 habi He, I	Sumangr		Juel T
			Lauhannad-Ashrahres	Torgian			NEW CONTRACTOR	+-	Againet V /P	
13		and the second second second	1.(1:11)	······································		50.01	GGPS BUllo Bunda (CK)	5umies7		
4	20	hiral-Ului	Ranin Shah	A HAR	1		ACCEPTION OF LOND TO STATE	Summar	Against V /P	•
Non Street		aziadilarooliasiewa we	evilubenmidtblaucenserst	gliger stillige		57.16	Gart Galgar (112)	Winter /	Agalual 4/Fm	Mark 1
16		agelfas biek	Harratovounita) sa sa	fshanglaire		VERION	Fognstonamia Bartamilloki	Winter	Agalust V /P	
•	<u>-1</u>	ahira Bibl	Abriul Qayy an	Mansahra	854	60.52	CGPS Arbay Jalbana ((AZ)	Winter	AgaInst V /P	
. 18	- - <u>-</u> F	erheena Ali Akbar	Ali Akbar	Mansehra	MA	55,42	GGI'S Murata (AZ)	Winter	Against V /F	
- 19		ariyiladararaa	Aniullah	Shanglasan	SOO MA MOT	155.47	GGPS Khanday (RK) Kees SUS	Winter	/v;ainst V /₽	
		lavarianas restautist	•Mohammad lubal	Manschrac	MA	266)170	GGPS Kandigala (OK)	Summer	Against V /P	
· _ 21		Farah Bibi	Nascer ud Din Shah	Manschra	AN	55.86	GGPS Taigram (HZ)	Winter	Agains('V /P	
	2	Jamila Bano	Duri Aman Qureshi	Mansehra	: MA	55.44	GGPS Cheur (BK)	Summer	Against V /P	
- 23	3	STIMbal/Bibles	Shamsher All	stiandia 3			GGPS Khandav (BK) a	Winter	Against V /P	. ·
20	i"	Lubna Urool as a res	-Munawar Knon, seru			5 65.03	GGPS CHEEF (BK)	Summer	Against V /P	-
	<u>5</u> 37	-ar-alia - Alia - State	zichiabiburehiman and				F N GGPS-Shharay/UIZ	REAL PROPERTY	Against V /P	
	25	Tallat Jabeen	Ashrat Khan	Mansehri	в ілА	54.70	GGTS Jatka Sygdan (BK)	ຣູບ່ານກອກ 	Against V /P	Jue
	75	AGEIHUR MERRING	a Gul Baz Khanya Ta	Stiangla	N FUEMAS	\$1.54:60	RGGTS Geela: (UK)	Winter	AgaInst V /P	
			anst-duhkarimmenany Angganakaring ang	S ashangla	N TO MARK	53:5	CGPS X SUGPLUNI-7	Winter	Against V /P	
	2957	woolina Biblina and a start	Khawaiwuliammad	C EManson	F BRMAN	53.4	Li TGGPS)Dabai(MIG	Summer	Against VYP	
		fruntaz Bagun (Soran			the share	Q 7510	12 RGCP.ButGEBAND3((BK)	Summer	Against V /P	<u>'</u>
		Shanim Akhiar 3552				62.6	GGPS Kaustrieski	Winter	Against V /F	7
	1	ShahnaziBagumana ti	Sias Khan security	TShangla	N N NAT		GGPS:Lonia (BK)	Winter	Against V /F	
		5Nazma-Sherint Sarah Daga Sherint Sarah		Ser Staansen	AMAN	题。 52:7	9) XGGPSChapre Judba (BL) 191			
E	. <u>14</u> -9	Biblzainaburgations		To Manset	BSC BSC	-10:12:5Z:t	SU (GGPS:Uaikot (NK) C	Sumnie	r Against-V-II	
	23477 7357 7357	1	Gohar Rahman	Mansel	IN TESMA	76% (M-52)	GGFS'Kund Till (HZ)	ANT WINDOW	Against V /	P.
1 -	36	RomaBiblion	Abdilli Kadmasara	sty vShang	an ann MA	52	62 TGGPSizcezari (BK)	Summo		
. 시	13 (A.)	r Samina <u>Bibl</u>	Chulen Cowartich	mentermanse	MA MA	股份 同時23	GU T GGPSZONEJOV (AZ)	Winter;	Auginst V-1	ସା
104					· ,	· ·	156 1	· · · (1

fi

÷...

ansi qo

ATESTED

2

THE PLAN IN THE PLANE

.....

	· • .				.($\left(q \right)$		
20	Linxatia	Mathæmmadi ligibæli	Mansehre	MA	56.1	7 GGPS Kund Bala (BK)	Summer	
21	Fænæth Bibli	Nerscer with Dim Shai	n Mansehra	MA	55.8	6 GGPS Taigram (HZ)	Winter	V//P Ageinst
22	Jæmilæ Bæmo	Duni Anram Quassihi	i Mamsehra	MA	55.1	I GGPS Chack (BK)	Summer	Against
23	Sumbal Bibi	Sitzansiher Alli	Shengla	MA	55.10	GGPS Khandry (BK)	Winder	V/P Against
24	U włomen Włewojj	Winnewser Kitero	Mansehra	MA	55.03	GGPS Check (BK)	Summer	Against
25	Farzana	Halbilo wr Relinnern	Mamselvra	MA	54.93	GGPS Kunuray (HZ)	Summer	V//P Against
26	Traillait Jadoeerm	· Aethnaff Kitham	Manselva	MA	54.73		Summer	V/P Against
27	Aqual Hitti	Guli Banz: Kitozam	Shangla	MA	54.68	(BK) B GGPS Geeto (BK)	Winder	V//P Against
28	Faziat Bibli	Albedtall Kamiron	Sihangla	MA	53.63	GGPS Kalsa (BK)	Winter	V/P Ageinst
29	Robine Blbi	Kibewejj Muhemmad	Mansehra	MA	53.42	GGPS Doba (MK)	Summer	W//P Against
30	Munitez Bagum	Shiji Qul	Shengla	MA	53.01	GGPS Buto Banda (BK)	Summer	Against
31	Silmanniam Akhiteer	Salitzin Mizimmacai	Shangla	MA	52.86	GGPS Kalish (BK)	Winter	V//P Against
32	Shailmaz Begum	Siar Kiham	Shangla	MA	52.89		Warter	V//P Against
33	Nazıma Sherin	Ministra Jiam	Mansehra	MA	52.79		Summer	V/P Against
34	Bibi Zainsto	Albaliel Qayyyuan	Mansehra	BSc	52.69	(BK) GGPS Gelkot (NK)	Summer	V//P Against
35	Sheibana Kausar	Gothan Rethinian	Mansehra	MA	52.64	GGPS Kund Tilli (HZ)	Winter	V//P Against
36	Ruqia Bibi	Albotiuli Kaniim	Shangla	MA	52.62	GGPS Zeezat (Bk)		V//P Against
37	Samina Bibi	Ghullann Sanvaear Kitoan	Mansehra	MĂ	52.60	GGPS Zonglay (AZ)	Winter	V//P Agaimst
38	Shabima	Muitemmedi Zemmen	Manseitra	MA	52.57	GGPS Judba No.N	Summer	V/P Ageinst
39	Gæzallæ	Tagj Malathansonsanti Kihana	Sthangla	MA	57.51	GGPS Kareen (Bk)	Winter	W/P Against
40	Haustman liqibati	Muthannannadi liqibali	Mansehra	MA	52.32	GGPS	Winter	V/P Against
41	Nkoskelba Hibi	Mulhammadi Basihir	Shængia	MA	32.02	GGPS	Summer	V/P Against
42	Tæltominæ Bilbi	Gull Rehmen	Mansehra	MA	51.87	GGPS	Wärtiter	V/P Against
43	Rabia Bibi	Aunang Zeib	Mansehra	MA	51.86	GGPS taigram (HZ)	Winter	V/P Against
44	Wizomas Famauz	Sanfanaız Kiham	Manseina	MA	61.65	GGPS Korlay (NK)	Summer	V/P Against
45	Shahida Bibi	Maalki Mahammadi Zaman	Mansehra	MA	51.66	GGPS Kotlay (NK)	Summer	V//P Avgæimst
46	Rizwana Bibi	Hisyden Zarram	Mansehra	MA	51.56	GGPS Shokati (HZ)	Winter	V//P Against
47	Seinne Khattoom	Nibon Reihmun	Mansehra	MA	51.51	GGPS Murata (AZ)	Winter	V/P Against
48	Aisha Begum	Taij Mutermmed Kiham	Mansehra	MA	51.47	GGPS Mundo (AZ)	Winter	V/P Against
49	Sajeda Bibi	Rozi Khen	Shangla	MA	51.39	GGPS Karoon (BK)	Winter	V//P Against
50	kourro @eesitriir	Multrammach Masshir	Mansehra	MA	51.29	GGPS Katna (HZ)	Summer	V/IP Against
51	Ruthi isamuul ittaq	iksamuli iHkaqı	Manselva	MA	51.10	GGPS Dour payee (BK)	Summer	V//P Against
52	Rabia Kiheloom	Malui Muhammad	Manselura	MA	60.51	GGPS Kama (HZ)	Summer	V/P Against
53	Inum Shezadii	Zamen Abdull Hemered	Mansehra	MA	50.51	GGPS Judba No. 1	Summer	V/P Against
54	Sidha Hannayum	Malfreinerenendi Wienerenendi	Mansebra	BA	52.42	GGPS Shokati (HZ)	Wanter	V/P Against
55	Nkrika Bibii	itterrenyeum Michaerenautiligiberi	'Mamsehra	MA	50.14	GGPS Murado (AZ)	Winter	V/P Against
56	Naila Bibi	Saim Mulhammadi	Mænsehra	MA	50.01	GGPS Ormal (HZ)	Summer	V//P Against
	·····				<u> </u>		- area along (K_N	V/P

1.57.65

ille ill billione and the second and Inna ja je to get a start and the second Tel Assault A start and a start of the first and a start of the start and the the beauting A 138864485724-22

BETTER COPY Page No 45 يبان طقى /D متك مساة لي المحاقار دختر سيد عظم سنة فعير أباد تحصل بالا و منها ماتر م حقى يلى موں محصر خطاقيت محمد الجوليين عبن الشرولوميت بشرد بائ الكر محكم عقر كو صلح تود تحسر عبى كسى جى سبول ميں آلھيات درتھا تو دقرت وہاں جر د ای ای د فی کایتر مول ایر و سال می کوی تبریلی قور میس کر اسی ارور ترسی ملی زمن فی ور کی اگر فقی فی مل مح اندر شد کی کے پا ملازمت ومر ما ترجع والاصول عقب مقر و عليف كرواني ر خا فاز المرام من حقى الما تحرير الم 2361 ر معان بالعار المعالمة المعار 13503-295774-2

Anna C*B* ایند سکیند مت جناب سکر دری صاحب ایلمتری ایند سکیند ری ایجو کیشن پیثادر۔ محكماندا يل-عنوان:-جناب عالى!

مودباندگزارش کی جاتی ہے کہ 302ء میں صلح مانسہرہ سے ضلع تو رغر تعینات کیے گئے تھے۔ اس شرائط سے ساتھ کہ ہمیں تین سال بعد اپنے ضلع ٹرانسفر کر دیا جائے گا۔ مگر گیا رہ سال ہونے کو ہیں اور ہمیں ٹرانسفر نہیں کیا جار ہا۔

جبکہ اس دوران 45 ساتذہ ادر ضلع تو رغر سے تعلق رکھنے والی اساتذہ سفارش اور اعلیٰ تعلقات کی بناء پر اپنے اصلاع ٹرانسفر ہوچکی ہے۔ بیرسب آپ کے علم میں ہے۔

جناب عالیٰ! (Female) DEO تو رغر نے ہم ے وعدہ کیا تھا کہ اب ایک یا دو لیچرز تو رغر سے زائسفر نیں ہو گی۔ بلکہ آپ سب کوایک ساتھ ثرانسفر کیا جائے گا۔ جبکہ شازیہ زیب جی جی پی پی ایس سر بگواور رضوانہ جی بی پی ایس شوکاٹی صلح مانسہ ہو ادرا پیٹ آبدا ٹرانسفر ہو چکی ہیں۔ کیا ان کے جتابے Staff Gap نہیں ہو گا؟؟ کیا سکول بند نہیں ہو نے کی لیچرز کی کی نہیں ہو گی؟؟؟

ہم تو آپ سے انصاف کی امید لگائے ہوئے ہیں جبکہ ہمارے ساتھ تھیل تھیل جا رہا ہے۔ شازیہ زیب 2017ء میں Appoint رتی۔ تکر ژانسفر ہم سے پہلے ہور ہی۔ من سمیا بی بی 2016ء میں Appoint روئی تکر ان کیٹر انسفر کو بھی سال کزر چکاہے۔ اور اس ساتو رغر ڈومیسائل ہولڈ تھیں۔ س قد رزیا دتی کی جارہی ہے۔ ہمارے ساتھ اس لیے ہمارے پاس کوئی بڑی سفارش نہیں ؟؟

جناب عالی است صلح مانسمرہ سے بحرتی ہونے والی چند اسانڈہ کو سکیل 14 دیا گیا ہے جس میں شرط بید کھی گئ سل کہ اگر سکیل 14 لیا تو NOC نہیں دی جا سکے گی۔ اگر سکیل 14 لینکے تو مرانسفر کی صورت میں آپ کو سکیل 14 Regfuse کرنا پڑے گا۔ ہماری بے لی کا اندازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی قابلیت ہونے کے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر بلو حالات بہت زیا دہ خراب ہیں ہمارے نیچ دوسروں کے رحم وکرم پر بل رہے بیں۔

جناب عالی! ترقی سے نہیں چاہیے اگر ہم اپنے گھروں سے ڈیوٹی یو قرار رکھ کتے تو ہم سکیل 14 لازی لیتے سی سے ترقی

12 11 سالوں ہے ہم سکیل 12 میں ہی ڈیوٹی کررہے ہیں۔ جناب عالیٰ! آپ کے پاس اپنے سکول چلانے کیلئے کی اور راہتے ہیں ہماری زندگیاں قربان کرنے کا راستہ کیوں؟؟؟ ہم ساری زندگی تو رغر کے نام نہیں کر سکتے۔ ہمارے بچے دوسروں کے رحکم وکرم پررہ رہے ہیں۔ ہمارے گود کے بچائے روزنٹی نٹی بیار یوں میں مبتلا ہو گئے ہیں اور آپ ان تمام با توں سے بخوبی آگاہ ہیں۔ لہذا تمام ٹیچرز کا آپ سے پروز درمطالبہ ہیکہ ان ٹیچرز کی ٹرانسفر کور دکا جائے یا پھر ہم سب کوا یک ساتھ ٹرانسفر کیا جائے ۔بصورت دیگر ہم عدالت کارخ کریں گے۔سیکرٹریٹ جائیں گے۔سکول بند کریں گےاور جومناسب ہوا اپنے حق کے لیے کریں گے۔ضلع مانسہرہ سے تعلق رکھنے والی اسا تذہ کے نام مندرجہ ذیل ہیں۔

الرقوم:2023-27-20

	13501-1295774-2	جي جي بي ايس بمبل	- يې يې سلمان نگار
of Car		جی جی پی ایس کرنل حسن زئی	۲- رابعه خانون
Rabia		جي جي بي ايس بگدو	۲- صاعقہ
NP.		جى جى بي ايس جلدنگ	لہم۔ نائلہ بی بی
Nn09	✓ 13501-9098694-6 13503-5580290-8	جى جى پي ايس كمال بانڈ ہ	۵ بشره یی یی
· · · ·	∕∼₁3504-7245998-6	جى جى بى اليس باغثر ە دوسستا بىچىد	المتحرب صائمته بي بي
· (M/K -	13501-0421418-	· · ·	کے۔ تنزیلہامان
W Store	13501-12898	بى بى بى اليس اورىل 🔿 - ك	۸۔ نائلہ بی بی
47X 4	13504-948480	1-6 Jub	٥- روبينه بي بي
Talua	13504-169175	جى جى پى ايس كرھى جد بەچ 🚽 📲	۵۱- طا بره بی بی
Shuhnes	13503-188484	جی جی پی ایس کنڑے 4 - 5 ا	سلع اشهنار بي بي
du l	43301-85729816	جى جى بى ايس كلكو ي اربخ	سعد سيد بي بي
San	13504-057482	جى جى بى إكس موراتان 8	۳۱- ماتمه بی طانو ن
· · ·			الما- فرينه بي بي
bannen	5	جي جي بي ايس مرادو 🛛 🗢	۵۱۔ صفیہ بی بی
Str	ac	بی بی بی ایس مرادو جی جی پی ایس مرادو جی جی بی بی بیس کمبیر	ind lo
Temine	- IEU		
liem			

تور جاب چف شرماد فير بخو تواد الله + ٥ الود + ٥

(13

جاب بالله منلح المم من 2013 ، من جرق مون وال اساخد وسل 14 دیا کیا ہے۔ اس میں شرط یہ رکی گی تھی اگر سکیل 14 لیکے تو آپ کو زائم کے بعد دوبارہ سکیل 14 اس میں شرط یہ رکی گی تھی اگر سکیل 14 لیکے تو آپ کو زائم کے بعد دوبارہ سکیل 14 Refuse گرتا ہے گی تھی اگر سکیل 2014 کے خاطر یہ قربانی بھی دے دی۔ کی کہ مارے کھرلے طلات مہت ذیاد خراب ہیں۔ جارے بچ دوسرے کرم دکم پر لی می جی۔ طلات مہت ذیاد خراب ہیں۔ جارے بچ دوسرے کرم دکم پر لی می جی۔ طلات مہت ذیاد خراب ہیں۔ جارے بچ دوسرے کرم دکم پر لی می جی۔ طلات مہت ذیاد خراب ہیں۔ جارے بچ دوسرے کرم دیکھ تو ہم کیل طلات میں خال اس میں تی ترق کے تو میں حکم اس میں بی حدود کی تو اس کی تھی۔ طلاق میں ترق کے تو میں کی کی تو میں جارے اس میں تو دی کہ تو میں کی کی تو دی کی تو میں کی کے تو میں کیل طرح کی لیے 2013 کی سرف چند معلمات ہیں جاں دوت 12 سکیل میں ہیں۔ لیڈ آ کی خیل ہے دارت میں جارے استد عالے کہ دوسر کرت ایج کمن آ میں تا ہے ہو دی کھی تو دی کر کھی

سادر قربالا جائے کہ جس NOC فراہم کی جائے۔ کیونکہ ہارے پائی آپ کے علاقہ کوئی بڑی ستارتی تیر کہ ایم ڈسٹر کت ایج کیشن آفیسر (زنانہ) تورخرے ستارتی کردائی میں دیماری آخری اسید آپ تیں یہ میں انساف دیا جائے تمام عرد عاگور ہیں گے۔ علادہ انہ یں کی تلافی تی رکھتے ہیں اگر، مے پہلے کوئی ہی ٹیچر یہای سے فرانسفر ہو کر مند کی تو یہ بچی تلاہ میں تی تھی۔

فيداحمر بانى فرماكر جارى درخواست يرتحد كماجات

للم الم الم الم الم <u>- المنالح</u>

		· · ·	· · · ·
		· · · · · · · · · · · · · · · · · · ·	
ALC D			5
	Sovr	RNMENT OF	
		PAKHTUNKHWA	14
	Seconi Elementary & Seconi	DARY EDUCATION DEPART	IMENT (D
a Yoshiya ana sana sana sana sa ang	a ann an 18 an 19 an 19 an 19 an 19 anns anns an 18 anns an 19 anns an 19 anns an 19 anns an 19 an 19 an 19 an 1	No. SO E&SED (P/F)2-1/Torg	har/2023
То .		. Dated Peshawar, the 24 th Jul	y. 2023
	The Director,	х.	
	E&SE Khyber Pakhtunkuwa,		

Peshawar.

Tani directed to refer to the subject cited above and to enclose herewith a copy of softwarplanatory **gf** joint appeal submitted by Bibi Salma Nagar GGPS Bembal District Torghar and others for submission of views/comments within 07-days positively for further processing of the case accordingly.

Ener As above.

CTION OFFICER OF

Ender: of even No & date: -

- Copy forwarded to the: -

1 PS to Secretary E&SE Ocpartment Khyber Pakhtunkhwas 2. Master File,

ICEL 44

BETTER COPY

15

GOVERNMENT OF KHYBER PAKHTUNKHWA **ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

No. SO/E&SED (P/F)2-1/Torghar/2023 Dated Peshawar the 24th July, 2023-11-30

To

The Director E&SE Khyber Pakhtunkhwa Peshawar

Subject;

DEPARTMENTAL APPEAL.

I am directed to refer the subject cited above and to enclose herewith a copy of above explanatory of joint appeal submitted by Bibi Salma Nagar GGPS Bembal District Torghar and others for submission of views/ comments within 07-Days positively for further processing of the case accordingly.

Ends As above.

SECTION OFFICER (P/F)

Endst: of even No & date:

Copy forwarding to the:-

- 1. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
- 2. Master File.

SECTION OFFICER (P/F)

RC 12-3863 m. 0346-9225049 NIC 37405-657620-1 TH. 1 Jon 1 19 Email. Mahammil asjedadu elgmit ~~~ Kg 26 juin Culps/ شق شي . (July on instancial اعْشْرَ مِدْ آنْك مقدمہ مندرجہ میں اپنی طرف ے واسطے بیروی و جواب دہی کل کاروائی متعلقہ آل مقام کود کیل مقرر کر کے اقر ارکرتا ہوں کہ صاحب موصوف کومقد مہ کی کل کا رواقی کا کا ل اختیار ہوگا نیز وکیل صاحب موصوف كوكرف راضى نامه وتقرر مثالث وفيصله برحلف وديني اقبال وعوى اوربصورت ديكر دحري سرانے اجراء وصولی چیک رویہ دعرضی دعویٰ کی تصدیق اوراس پرد شخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل پاکسی جزوی کا روائی کے لئے کسی اور وکیل پامختارصا حب قانونی کواپنے ہمراہ اپنی بیجایے تقرر کا اختیار بھی ہوگا درصاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گےاوراس کا ساختہ پرداختہ مجھ کومنظور وقبول ہوگا۔ دوران مقد مہ جوخر چہو ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق د کمل صاحب ہوں گے۔ نیز بقایارقم وصول کرنے کا بھی اختیار ہوگا۔اگرکوئی پیشی مقام دورہ پر ہویا حدے باہر ہوتو دیک صاحب موصوف یا بند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اورا گرمخنار مقرر کردہ میں کوئی جز وبقایا ہوتو وکیل صاحب موصوف مقند مہ کی چیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نائش بصيغه مفلس بالأكر في المراري يبيروي كالبهم صاحب موصوف كواختيار بهوگا۔ لهذادكالت نامتجريركيا تاكل فيدر بقام: المعام المارين 07/11/2023 · (3) وقاص نو ثوستیٹ کچہری(ایبٹ آباد)